

09/672,636

00AB151

29. (Original) A video controller for interfacing a frame buffer to a display in a computer system, comprising:

a raster engine adapted to receive video data from the frame buffer, to format the video data, and to render the formatted data to the display; and
means for selectively blinking at least one pixel on the display operatively associated with the raster engine.

REMARKS

Claims 1-29 are currently pending in the subject application and are presently under consideration. A clean version of all pending claims is found at pages 2-8 of this Reply. No claims have been amended herein.

Applicant's representative notes with appreciation the Examiner's indication that claims 7, 14, 21, and 28 would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. However, such amendments are not believed necessary in view of the below-noted deficiencies of the cited art *vis a vis* applicant's claimed invention.

Favorable reconsideration of the subject patent application is respectfully requested in view of the comments herein.

I. Rejection of Claims 1, 15 and 29 Under 35 U.S.C. §102(b)

Claims 1, 15 and 29 stand rejected under 35 U.S.C. §102(b) as being anticipated by Shibata *et al.* (US patent 4,845,477). It is submitted that this rejection should be withdrawn for at least the following reasons. Shibata *et al.* does not disclose each and every element as set forth in the subject claims.

For a prior art reference to anticipate, 35 U.S.C. §102 requires that "each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *In re Robertson*, 169 F.3d 743, 745, 49 USPQ2d 1949, 1950 (Fed. Cir. 1999) (quoting *Verdegaal Bros., Inc. v. Union Oil Co.*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)).

09/672,636

00AB151

The present invention relates generally to the field of video displays and more particularly to an improved *raster engine with multi-mode programmable blinking*. (See, e.g., page 1, lines 4-6.) The claimed invention allows for finer grained *pixel* blinking control than was previously available using conventional character dot blinking methodologies. (See, e.g., page 18, lines 18-19.) Independent claim 1 of the subject application recites "*a raster engine adapted to receive video data from the frame buffer, to format the video data, and to render the formatted data to the display; and a hardware blink logic system operatively associated with the raster engine to selectively blink at least one pixel on the display.*" Independent claims 15 and 29 recite similar limitations. The raster engine of the subject claims "*is easily programmed to interface a computer system running a variety of application programs with a plurality of disparate display types.*" The invention can thus be employed in high end as well as highly cost sensitive computer system applications in association with displays *ranging from high definition television (HDTV) to low resolution monochrome EL and/or LCD display panels.*" (Page 4, lines 25-30.) The raster engine of the subject claims is capable of *formatting video data for rendering to a display*. (See, e.g., Claims 1, 15, and 29.) "In addition, the raster engine can further comprise an integrated digital to analog converter (DAC) to support analog LCD displays and CRTs." (Page 9, lines 11-12.) Shibata *et al.* does not disclose such aspects of the present invention as set forth in the subject claims.

Contrary to the Examiner's assertion, Shibata *et al.* fails to disclose a rastering engine as described by the present application. The Examiner's cited parts describe "a color CRT 16 driven by the color video signal from the video circuit 14 to visually display the color image." (Column 2, lines 42-44.) The Examiner's cited parts further disclose the conventional manner in which a CRT operates to create an image or display, e.g., by employing a "raster scan of the color CRT 16 when the color image is displayed." (Column 2, lines 48-49.) It is readily apparent that the raster scan of the CRT 16 is not a "*raster engine*" *capable of formatting video data in a variety of formats for rendering on any of a variety of display types* as in applicant's claimed invention. Rather, the CRT 16 is merely an display device. A conventional CRT that rasters an electron beam across a treated glass screen to effectuate the creation of an image does not anticipate a *raster*

09/672,636

00AB151

engine capable of formatting data in a variety of formats as recited in the subject claims. Furthermore, it is readily apparent that the raster engine of the subject claims is not a mere CRT display device. Thus, Shibata *et al.* fails to disclose each the raster engine of independent claims 1, 15, and 29, which "is easily programmed to interface a computer system running a variety of application programs with a plurality of disparate display types." (Page 4, lines 25-27.)

In view of the above comments, it is readily apparent that Shibata *et al.* does not anticipate or make obvious the presently claimed invention as recited in independent claims 1, 15, and 29, and 2-6, 8-13, 16-20 and 22-27, which depend respectively there from. This rejection should be withdrawn.

II. Rejection of Claims 2-6, 8-13, 16-20 and 22-27 Under 35 U.S.C. § 103(a)

Claims 2-6, 8-13, 16-20 and 22-27 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Shibata *et al.* (US 4,845,477) in view of Fleming *et al.* (US 4,439,759). It is submitted that this rejection should be withdrawn for at least the following reasons. Neither Shibata *et al.* nor Fleming *et al.*, alone or in combination, teach or suggest every limitation set forth in the subject claims.

To reject claims in an application under §103, an examiner must establish a *prima facie* case of obviousness. A *prima facie* case of obviousness is established by a showing of three basic criteria. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) *must teach or suggest all the claim limitations*. See MPEP §706.02(j). The *teaching or suggestion to make the claimed combination* and the reasonable expectation of success *must both be found in the prior art and not based on applicant's disclosure*. See *In re Vaack*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991) (emphasis added).

09/672,636

00AB151

Claims 2-6, 8-13, 16-20, and 22-27 depend directly or indirectly from independent claims 1, 15, and 29, which are believed to be allowable for the aforementioned reasons. Fleming *et al.* does not make up for the aforementioned deficiencies of Shibata *et al.* with respect to independent claims 1, 15, and 29. Fleming, *et al.* merely teaches a plurality of algorithms for blinking picture elements.

Accordingly, this rejection should be withdrawn.

CONCLUSION

The present application is believed to be in condition for allowance in view of the above comments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063.

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicant's undersigned representative at the telephone number listed below.

Respectfully submitted,

AMIN & TUROCY, LLP



Himanshu S. Amin

Reg. No. 40,894

AMIN & TUROCY, LLP
24TH Floor, National City Center
1900 E. 9TH Street
Cleveland, Ohio 44114
Telephone (216) 696-8730
Facsimile (216) 696-8731